

Rachel S. Doughty (Cal. Bar No. 255904)  
Cyrus J. Moshiri (Cal. Bar No. 315717)  
GREENFIRE LAW, PC  
2478 Adeline Street, Suite A  
Berkeley, CA 94703  
Ph/Fax: (510) 900-9502  
Email: rdoughty@greenfirelaw.com  
cmoshiri@greenfirelaw.com

*Attorneys for Save Our Forest Association*

ADAM R.F. GUSTAFSON  
Acting Assistant Attorney General  
United States Department of Justice  
Environment & Natural Resources Division

EMMA L. HAMILTON (CA Bar No. 325360)  
Trial Attorney, Natural Resources Section  
201 Third Street NW, Suite 900  
Albuquerque, NM 87102  
Phone: (202) 305-5689 (Hamilton)  
Email: emma.hamilton@usdoj.gov

*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**EASTERN DIVISION – RIVERSIDE**

SAVE OUR FOREST ASSOCIATION,  
INC.

Plaintiff,

vs.

UNITED STATES FOREST SERVICE, *et*  
*al.*,

Defendants.

Case No.: 5:24-cv-01336

**STIPULATION TO AMEND  
BRIEFING SCHEDULE**

Action Filed: June 25, 2024  
Trial Date: N/A

1 WHEREAS, on August 27, 2024, Plaintiff Save Our Forest Association, Inc.  
2 (“SOFA”) filed its First Amended Complaint for Injunctive and Declaratory Relief”  
3 [ECF No. 24];

4 WHEREAS, Defendants filed their Answer on November 8, 2024 [ECF No.  
5 29];<sup>1</sup>

6 WHEREAS, SOFA and the Defendants (“Parties”) wish to minimize their  
7 procedural disputes and proceed to resolution of this case in an expedited, yet orderly,  
8 manner by having the Court set a schedule for briefing dispositive motions and cross-  
9 motions for summary judgment;

10 WHEREAS, on July 14, 2025, the Parties filed a stipulated proposed briefing  
11 schedule with this Court [ECF No. 62], which this Court entered on August 18, 2025  
12 [ECF No. 72];

13 WHEREAS, on August 8, 2025, the Federal Defendants provided SOFA with a  
14 draft proposed Administrative Record;

15 WHEREAS, SOFA has suggested additions to that draft proposed  
16 Administrative Record;

17 WHEREAS, the Parties have met and conferred and are in the process of  
18 working through their disagreement about the scope of the Administrative Record in  
19 this matter and whether the assistance of the Court will be needed to resolve any  
20 dispute regarding its content;

21 NOW THEREFORE, the Parties hereby stipulate and agree, and request that  
22 the Court enter an order setting the following amended schedule to accommodate the  
23 Parties’ time for conferring about the scope of the Administrative Record:

24 1. Modify the Court’s August 18, 2025 “Order on Stipulation for Proposed Briefing  
25

26 \_\_\_\_\_  
27 <sup>1</sup> On March 6, 2025, Yuhaaviatim of San Manuel Nation (“Nation”) filed a Motion to Intervene and  
28 Motion to Dismiss [ECF No. 38], and the Court issued its Civil Trial Scheduling Order [ECF No.  
40].

Schedule,” ECF No. 72, as follows:

2. Paragraph 2: Change the “August 15, 2025” date to “September 1, 2025,” and insert “remaining records they believe to be missing from the Administrative Record and” after “any,” so it now reads: No later than September 1, 2025, SOFA will notify Federal Defendants of any remaining records they believe to be missing from the Administrative Record and issues regarding the proposed content of the Administrative Record;
3. Paragraph 3: Change the “August 22, 2025” date to “September 19, 2025,” so it now reads: No later than September 19, 2025, the Parties shall complete any conferral attempting to resolve any differences they may have regarding the proposed content of the Administrative Record;
4. Paragraph 4: Change the “September 5, 2025” date to “September 30, 2025,” so it now reads: No later than September 30, 2025, Defendants shall lodge with the Court, in PDF format on an external hard drive, the Administrative Record for this case, providing SOFA with a copy on the same day;
8. Paragraph 8: To accommodate a potential conflict with the holidays, change “30th” to “60th,” delete “the later of,” and insert “on or before the 30th day after” after the second “or,” so it now reads: On or before the 60th day after the lodging of the Administrative Record, or on or before the 30th day after final resolution of any Administrative Record motion filed pursuant to Paragraph 6 above, whichever is later, Plaintiff shall file its summary judgment papers, including a statement of undisputed facts (“SUF”), with SOFA’s facts and disputes numbered,<sup>2</sup> and with the memorandum of points and authorities not to exceed 25 pages;
9. All other paragraphs of the Court’s August 18, 2025 “Order on Stipulation for Proposed Briefing Schedule,” ECF No. 72, should remain the same.

---

<sup>2</sup> The Parties shall follow the direction in this Court’s standing order of March 24, 2016.

1 Dated: August 29th, 2025

Respectfully Submitted,

3 By: /s/ Rachel S. Doughty (with permission)

4 GREENFIRE LAW, PC

Rachel S. Doughty

5 2478 Adeline Street, Suite A

6 Berkeley, CA 94703

7 Ph/Fax: (510) 900-9502

Email: rdoughty@greenfirelaw.com

8 *Attorneys for Plaintiff*

10 Dated: August 29th, 2025

Respectfully Submitted,

12 By: ADAM R.F. GUSTAFSON  
13 Acting Assistant Attorney General  
14 United States Department of Justice  
15 Environment & Natural Resources  
Division

16 /s/ Emma L. Hamilton

17 EMMA L. HAMILTON (CA Bar No.  
325360)

18 Trial Attorney

19 ANDREW A. SMITH (NM Bar No. 8341)

Senior Attorney

20 c/o United States Attorney's Office

21 Natural Resources Section

22 201 Third Street NW, Suite 900

Albuquerque, NM 87102

23 Phone: (202) 305-5689 (Hamilton)

(202) 598-3803 (Smith)

24 Email: emma.hamilton@usdoj.gov

25 andrew.smith@usdoj.gov

26 *Attorneys for Defendants*

1 Pursuant to Local Rule 5-4.3.4, I hereby attest that each of the other signatories  
2 concurs in the filing of this document.

3  
4 Dated: August 29, 2025

/s/ Emma L. Hamilton

Emma L. Hamilton

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Emma L. Hamilton  
Emma L. Hamilton  
U.S. Department of Justice